

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS, ET AL.,

Plaintiffs,

v.

MARCO RUBIO, in his official capacity as
Secretary of State, and the
DEPARTMENT OF STATE, ET AL.,

Defendants.

CIVIL ACTION
CASE NO. 1:25-cv-10685-WGY

MOTION FOR ADMISSION *PRO HAC VICE*

Pursuant to Local Rule 83.5.3(b), I, Robert A. Bertsche, a member of the bar of this Court and counsel of record for proposed intervenors The Intercept and The Center for Investigative Reporting, respectfully move that attorney Renee M. Griffin of the Reporters Committee for Freedom of the Press, 1156 15th Street NW, Suite 1020, Washington, DC 20005, be permitted to appear *pro hac vice* to represent The Intercept and The Center for Investigative Reporting in this matter.

1. Ms. Griffin is a Staff Attorney at the Reporters Committee for Freedom of the Press. She is a member in good standing of the District of Columbia Bar, as well as the bars of the U.S. Court of Appeals for the Tenth Circuit and the U.S. District Court for the District of Columbia. Ms. Griffin has not previously had a *pro hac vice* admission to this Court revoked for

misconduct, and there are no disciplinary proceedings pending against Ms. Griffin in any jurisdiction.

3. Ms. Griffin is familiar with the rules of this Court.

4. In support of this motion, the undersigned relies on the Certifications of Ms. Griffin filed herewith.

WHEREFORE, the undersigned respectfully moves that this Court admit Ms. Griffin *pro hac vice* for the purpose of representing proposed intervenors The Intercept and The Center for Investigative Reporting in this matter, as co-counsel with the undersigned.

Respectfully submitted,

Date: December 3, 2025

/s/ Robert A. Bertsche

Robert A. Bertsche (BBO #554333)

KLARIS LAW PLLC

6 Liberty Square #2752

Boston, MA 02109

Telephone: 857-303-6938

rob.bertsche@klarislaw.com

*Counsel of Record for Proposed Intervenors The Intercept
and The Center for Investigative Reporting*

LOCAL RULE 7.1 CERTIFICATION

Counsel for The Intercept and The Center for Investigative Reporting hereby certifies that they conferred with counsel for the parties in a good-faith attempt to resolve this issue and informed them of their intent to file this Motion for Admission Pro Hac Vice. Counsel for both parties indicated they do not oppose the motion.

/s/ Robert A. Bertsche
Robert A. Bertsche

CERTIFICATE OF SERVICE

I hereby certify that on December 3, 2025, the within document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Robert A. Bertsche
Robert A. Bertsche

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CERTIFICATION OF RENEE M. GRIFFIN

Renee M. Griffin certifies as follows:

1. I make this certification in support of the accompanying motion for pro hac vice admissions and have personal knowledge of the facts stated herein.
2. I am a Staff Attorney at the Reporters Committee for Freedom of the Press, 1156 15th Street NW, Suite 1020, Washington, DC 20005.
3. I am a member in good standing of the District of Columbia Bar, as well as the bars of the U.S. Court of Appeals for the Tenth Circuit and the U.S. District Court for the District of Columbia.
4. I have not previously had a *pro hac vice* admission to this Court revoked for misconduct.
5. No disciplinary proceedings are pending against me in any jurisdiction.
6. I am familiar with the rules of this Court.

I certify under penalty of perjury that the foregoing is true and correct, this 3rd of
December, 2025.

s/Renee M. Griffin

Renee M. Griffin

rgriffin@rcfp.org

REPORTERS COMMITTEE FOR

FREEDOM OF THE PRESS

1156 15th St. NW, Suite 1020

Washington, DC 20005

Telephone: 202.795.9300

Facsimile: 202.795.9310